

EXHIBIT “K”

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF LUZERNE

Commonwealth of Pennsylvania

Docket No: MJ-11104-NT-0000015-2019

Case Filed: 1/4/2019

v.

Docket No: MJ-11104-NT-0000023-2019

Case Filed: 1/9/2019

Douglas Bruce

Docket No. MJ-11104-NT-0000279-2019

Defendant

Case Filed: 3/19/2019

RE-RENEWED MOTION TO DISMISS

These robotic citations are getting very stupid. I incorporate all the pleadings previously filed. To demand this out-of-state owner, who just paid thousands in property taxes, must send a "fine" over \$1,000 each time a citation is mailed is absurdly unconstitutional. The citation is unintelligible and inapplicable, as previously noted. Defendant is charged with "DEMOLITION." That is not a crime and not subject to a fine.

This pleading is being mailed directly to Alexandra Kokura Kravitz. Each \$6.80 certified mailing will be rebutted by a first-class denial and motion to dismiss. Eventually, defendant will sue Pittston for clouding title to his property and rendering it difficult or impossible to repair or sell. That will be a taking under the Fifth/Fourteenth Amendments to the United States Constitution. See the 1992 SCOTUS case of Lucas v. South Carolina Coastal Council, which makes government liable for an effective total taking. Defendant will add claims for denial of due process of law, wrongful infliction of emotional distress, and other torts and damages.

Dismiss these idiotic trash citations, go away, and leave defendant alone.

Submitted,



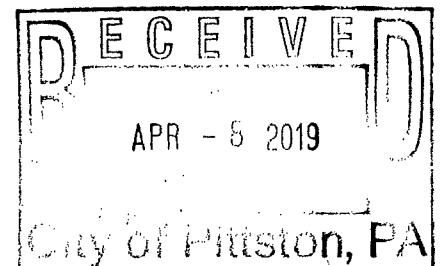
Douglas Bruce

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CERTIFICATE OF SERVICE

I certify that I mailed a postage-paid copy of this RE-RENEWED MOTION... on April 3, 2019 to:

Code Official, 35 Broad Street, Pittston PA 18640

